

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA**

SOUTH CAROLINA COASTAL CONSERVATION LEAGUE;
CENTER FOR BIOLOGICAL DIVERSITY; DEFENDERS OF
WILDLIFE; NATURAL RESOURCES DEFENSE COUNCIL,
INC.; NORTH CAROLINA COASTAL FEDERATION;
OCEANA; ONE HUNDRED MILES; SIERRA CLUB; AND
SURFRIDER FOUNDATION,

Plaintiffs,

v.

WILBUR ROSS, in his official capacity as the Secretary
of Commerce; the NATIONAL MARINE FISHERIES
SERVICE; and CHRIS OLIVER, in his official capacity
as the Assistant Administrator for Fisheries,

Defendants.

Civ. No. 2:18-cv-3326-RMG

**DECLARATION OF
ALICE M. KEYES**

I, Alice M. Keyes, declare as follows:

1. This declaration is based on my personal knowledge, information, and belief. I am over the age of eighteen (18) and suffer from no legal incapacity. I submit this declaration in support of One Hundred Miles' challenge to five incidental harassment authorizations issued by the National Marine Fisheries Service.

2. I am the Vice President of Coastal Conservation of One Hundred Miles. I am also a member of One Hundred Miles.

3. One Hundred Miles is a not-for-profit corporation founded in 2013. One Hundred Miles is incorporated under the laws of Georgia, maintains its headquarters office in Brunswick, Georgia, and currently has over 650 members.

4. The mission of One Hundred Miles is to preserve, protect, and enhance Georgia's 100-mile coast. We envision a future where coastal Georgia has thriving communities, protected landscapes, and secure wildlife. The conservation of marine wildlife and fisheries is a critical component of One Hundred Miles' work, and our organization works to protect and preserve the integrity of these resources throughout coastal Georgia.

5. One Hundred Miles has members throughout coastal Georgia. Many of these members regularly visit marine habitats for recreational activities, such as wildlife observation, fishing, paddling, photography, and other uses. Members of One Hundred Miles have used and enjoyed these areas in the past for the above-described activities, and our members intend to continue enjoying recreational opportunities in these areas in the future.

6. I also personally use and enjoy these aquatic habitats for recreational activities, such as the creeks and marshes in coastal Georgia. My family members and I enjoy birdwatching, canoeing, and exploring in the marine waters off of Georgia. We love experiencing the

tranquility and excitement of the wildlife habitat in coastal Georgia including the salt marsh, cypress swamps, maritime forests, beaches, and other important resources. In connection with these activities, we frequently observe marine wildlife such as dolphins, sea and shore birds, sea turtles and other marine species.

7. One Hundred Miles and its members have been deeply concerned about the impacts of oil drilling and seismic testing on the coastal and marine resources off of Georgia.

8. I understand that seismic surveying produces one of the loudest man-made noises in the ocean, and that, if permitted, these could occur off the coast of Georgia for months on end.

9. Seismic airguns pose a significant threat to marine mammals and sea turtles that rely on sound for communication, navigation, and other critical behaviors. Seismic airguns also pose a threat to finfish and shellfish, and crustaceans as well. Our organization is deeply concerned about these threats to the marine resources that our members regularly use and enjoy.

10. One Hundred Miles has participated extensively in the environmental review of proposed seismic surveys, including by submitting comment letters on this topic. For example, One Hundred Miles joined comment letters regarding the consistency (or lack thereof) of seismic testing with Georgia's Coastal Zone Management policies as part of the required review under the federal Coastal Zone Management Act. One Hundred Miles organized grassroots opposition to seismic testing and offshore drilling by supporting the adoption of ten local resolutions opposing offshore energy exploration and drilling. These resolutions were passed by governments that represent over 730,000 Georgia citizens. We hosted eight public education events around the state, including the screening of Sonic Sea and Shore Stories with expert panel discussions. One Hundred Miles staff and members also visited Washington D.C. to attend Blue Vision Summits, Coastal Voices Summit, and several national ocean lobby days with the intent to

inform Georgia's Congressmen and staff members of the community opposition to offshore activities. In July 2017, we submitted comments to the National Marine Fisheries Service raising concerns about five draft incidental harassment authorizations for seismic testing off the coast of Georgia. We are a member of the Business Alliance for Protecting the Atlantic Coast, an organization formed to oppose offshore activities. During the 2018 state legislative session, One Hundred Miles led the effort to support the passage of House Resolution 1041 and Senate Resolution 706, clearly stating legislative support for coastal fisheries and tourism and opposing oil and gas exploration and drilling that would jeopardize these coastal industries and threaten the well-being of Georgia's state marine mammal, the North Atlantic right whale. All but one of Georgia's coastal state legislators serving in the 2018 General Assembly supported these resolutions, and several plan to sponsor similar resolutions in the 2019 legislative session. One Hundred Miles has led Georgia's local and state-level opposition to seismic testing and offshore drilling since early 2015, at every opportunity opposing these activities.

11. One Hundred Miles' organizational interests and its members' interests in the conservation of marine species, particularly Georgia's state marine mammal, the North Atlantic right whale, whose only known calving grounds includes areas off the southern coast of Georgia, in addition to turtles, fisheries, and healthy ocean ecosystems, will be injured if the seismic testing continues.

12. Through this challenge, One Hundred Miles seeks to vindicate its organizational interests and its members' interests in protecting marine wildlife species from the enormously harmful impacts of high intensity noise pollution resulting from seismic surveys. The resolution of this litigation in favor of One Hundred Miles by stopping seismic testing in the Atlantic Ocean would redress the organization's and its members' injuries by protecting the coastal and marine habitat

and wildlife that its members enjoy and allowing the organization to continue to pursue its mission to preserve, protect, and enhance coastal Georgia.

I declare under penalty of perjury that the foregoing is true and correct.

2018-12-21
Date

Alice M. Keyes
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